TSD File Inventory Index

Date: July 28, 2008

Initial: CMKennard

Facility Name:	Plastic Kote (Media Facility)
Facility Identification Number:	OHD 091 620 369

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Total - 1

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1.			

Note: Transmittal Letter to Be Included with Reports.
Comments:_____

OHD 091 620 369

Brenda
Oswald/R5/USEPA/US
04/22/2005 11:43 AM

To

Subject Distillation Unit

Tom,

As an enforcement officer for the EPA, I must first say that I may not offer the advice of a consulatant. Compliance assistance is generally handled by our State counterparts. As you already know, however, the regulations under question (AA, BB, CC) are not authorized by Ohio. Therefore, I will give you some general guidance as to the regulations which you may consider as you determine whether or not the impending distillation system is regulated under RCRA.

Items to consider:
1. Is the entire system a true closed loop? [See, 40 CFR 261.4(a)(8)]. If yes, then the waste is neither a solid or hazardous waste until it leaves the system.
2. Is waste ever stored in a separate tank before reclamation? [See, 40 CFR 261.6(c)(1) and (2)]
3. The distillation unit alone is a RCRA exempt unit for generators. The answers to one and two determine if the rest of the system is exempt.
4. Also, when the waste leaves the system (still bottoms) be sure to analyze for hazardous constituents.

Hopefully, the above points help you make a determination. It is the best I can do without an official inspection.

Please call if you have further questions,

Brenda D. Oswald
Environmental Engineer
U.S. EPA, Region 5
Ph: (312) 353-4796
Fx: (312) 353-4342

plasti-kote® Co..

DATE: April 21, 2005

FAX - page 1 of 2

TO: Brenda

COMPANY:

FAX NUMBER: 312-353-4342

FROM: Tom Corpora

RE: Distillation Unit Drawing

Please call me if you have any questions.

Thanks

Tom

An ISO 9001 Certified Company

1000 Lake Road * PO Box 708
Medina, Ohio 44258
Telephone 330-725-4511
Toll Free 800-431-5928
Correspondence Fax 330-723-3674
Orders Only Fax 330-722-4382
www.plasti-kote.com
E-mail: plasti-kote@plasti-kote.com

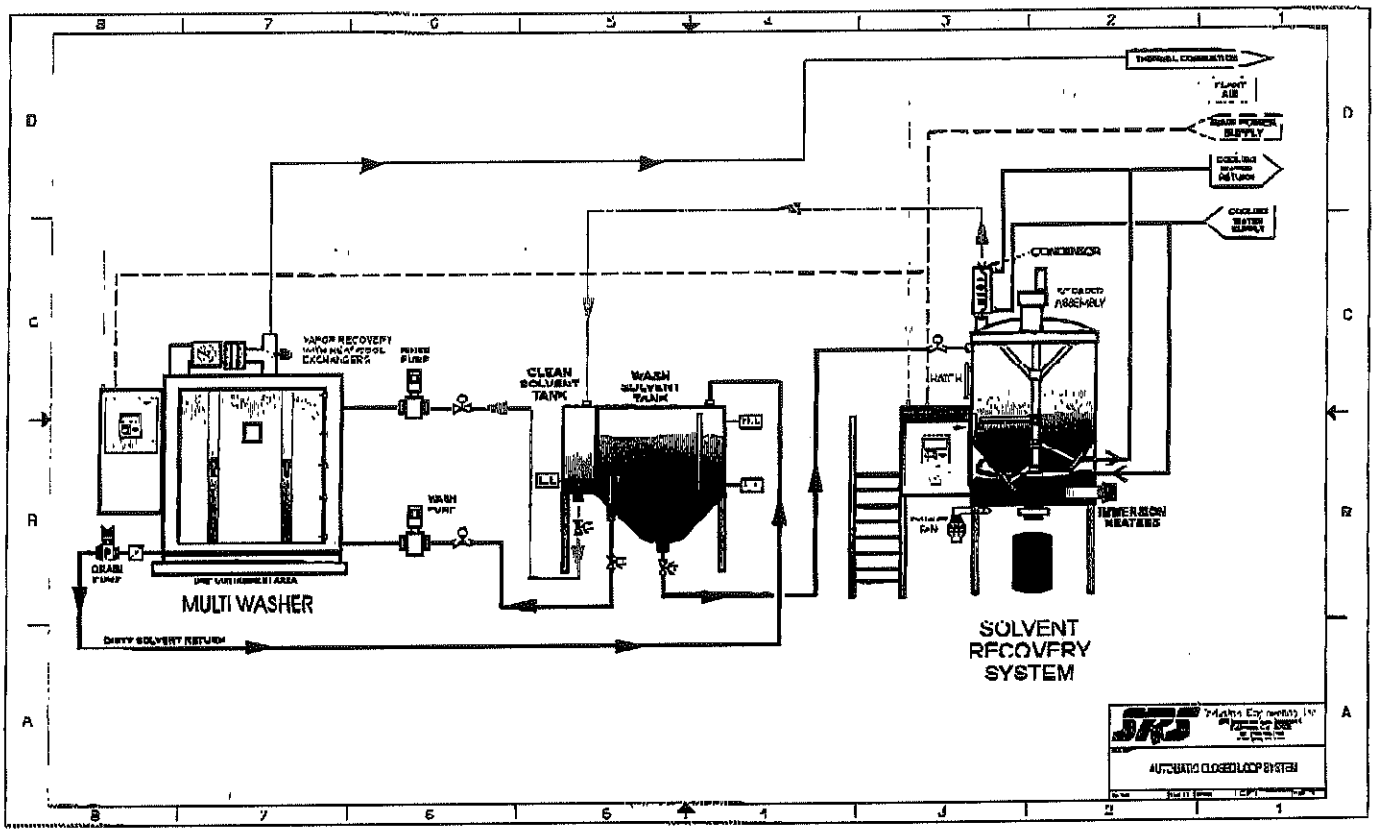

Figure 1-1 - This diagram shows a washer and distillation system in a closed loop configuration. At Valspar, the washer is an existing Hockmeyer system and as the still is remotely located, we would have a 75 gallon transfer, tank located at the still, which would be equipped with a pump to automatically transfer clean solvent to the clean tank at the washer. Existing solvent tanks at the washer may be used if desired as long as there is a high level sensor on the clean tank located at the washer.

SRS Engineering Corp. has been designing and manufacturing automatic solvent recovery systems in the United States and Canada for over 15 years, and has developed a line of systems ranging in capacity from a few gallons per hour to over 200 gallons per hour. All systems are designed for:

- Efficiency and reliability
- Ease of use
- Consistent high product quality
- Low cost of operation and maintenance

OhioEPA
State of Ohio Environmental Protection Agency
Northeast District Office

E. Aurora Road
Twinsburg, Ohio 44087-1969

TELE (330) 425-9171 FAX (330) 487-0769

Bob Taft, Governor
Christopher Jones, Director

June 7, 2004

RE: PLASTI-KOTE CO., INC.
OHD 091 620 369
MEDINA COUNTY
CEI/RTC

Mr. Tom Corpora
Plasti-Kote Co., Inc.
1000 Lake Road
Medina, OH 44256

Dear Mr. Corpora:

On June 4, 2004, Ohio EPA received a letter dated June 3, 2004, from Plasti-Kote Co., Inc. (Plasti-Kote) submitted in response to Ohio EPA's Notice of Violation (NOV) letter dated May 11, 2004. The response included the following:

A. Copies of three weekly inspection logs,
B. Copy of the training logs,
C. Used oil sticker,
D. Picture of the new Universal Waste Area,
E. Pictures of the new spill kits,
F. Site Map with the satellite accumulation areas and the less than 90-day accumulation areas marked.

Based on these submittals, it appears Plasti-Kote has adequately addressed all the violations as numbered in the April 2004 NOV:

Violations:

1. ***Satellite Accumulation Area Requirements, OAC 3745-52-34(C)(1)***
2. ***Labeling Requirements for Hazardous Waste Containers, OAC 3745-52-34(A)(2)***
3. ***Used Oil Storage Requirements for Generators, OAC 3745-279-22***
4. ***Accumulation Time for Universal Waste, OAC 3745-273-15(C)***

In addition, Plasti-Kote appears to have addressed the three concerns (5, 6 and 7) from the NOV.

Failure to list specific deficiencies and or violations in this communication does not relieve Plastic-Kote from the responsibility of complying with all applicable laws, rules and regulations.

Should you have any questions or require additional information, please contact Frank Popotnik, my supervisor, or me at (330) 963-1200.

Sincerely,

Karen L. Nesbit
Environmental Specialist
Division of Hazardous Waste Management

KLN/ams

ec: Frank Popotnik, Ohio EPA, NEDO, DHWM

cc: Tammy McConnell, Ohio EPA, Central Office, DHWM
Brenda Oswald, U.S. EPA, Region 5

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

DE-9J

MAY 17 2004

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Tom Corpora
Health, Safety & Environmental Coordinator
Plasti-Kote, Division of Valspar
1000 Lake Road
Medina, Ohio 44256

Re: Compliance Evaluation Inspection
EPA I.D. No.: OHD 091 620 369

Dear Mr. Corpora:

On April 22, 2004, representatives of the United States Environmental Protection Agency (U.S. EPA) and the Ohio Environmental Protection Agency (OEPA) inspected Plasti-Kote located in Medina, Ohio. The U.S. EPA's purpose for the inspection was to evaluate your facility's compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA), specifically the Air Emission Standards Applicable to Generators of Hazardous Waste set forth in 40 CFR 265, Subparts AA, BB, and CC. Enclosed, please find a copy of the federal inspection report dated May 3, 2004.

As of this writing, based upon information available to the U.S. EPA, our review of the inspection has not resulted in the detection of violations of any of the specific RCRA requirements under evaluation. This determination does not limit the applicability of the requirements evaluated, other RCRA regulations, or regulations under other environmental statutes. The OEPA will issue a separate letter regarding their findings based on the general Standards Applicable to Generators of Hazardous Waste. The U.S. EPA and OEPA will continue to evaluate your facility in the future.

If you have any questions or concerns regarding this matter, please contact Brenda Oswald of my staff at 312-353-4796.

Sincerely,

Paul Little, Section Chief
Enforcement and Compliance Assurance Branch
Compliance Section 2
Waste, Pesticides, and Toxics Division

Enclosure

cc: Karen Nesbit, OEPA

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

MR. TOM CORPORA
Health, Safety + Environmental Coordinator
Plasti-Kote, Division of Valspar
1000 Lake Road
Medina, OH 44256

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)*: F. RAIN
B. Date of Delivery: 5.19.9

C. Signature
X Flo Rain
☐ Agent
☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number
(Transfer from service label) 7001 0320 0006 0177 2633

PS Form 3811, March 2001 Domestic Return Receipt 102595-01-M-1424

Waste, Pesticides and Toxics Division

Type of Document:
- ☐ Notice of Violation and Inspection Report/Checklist
- ☒ No Violation Letter and Inspection Report/Checklist
- ☐ Letter of Acknowledgment
- ☐ Information Request
- ☐ Pre-Filing and Opportunity to Confer
- ☐ State Notification of Enforcement Action

Facility Name : PLASTI-KOTE

Facility Location: 1000 LAKE ROAD

City: MEDINA **State:** OH

U.S. EPA ID# OHD 091 620 369

Assigned Staff BRENDA OSWALD **Phone:** 3-4796

Name	Signature	Date
Author	Brenda Oswald	5/10/04
Regional Counsel		
Section Chief	SRH	5/10-04
Branch Chief		

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file;
   - One copy for the branch file; and
   - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's. Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

7001 0320 0006 0177 2633

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

MEMORANDUM

DATE: May 3, 2004

TO: Tom Corpora - Plasti-Kote

FROM: Brenda Oswald - Environmental Engineer
Waste, Pesticides and Toxics Division
Enforcement and Compliance Assurance Branch
Compliance Section 2

SUBJECT: Inspection Notes for April 22, 2004
Compliance Evaluation Inspection for Subparts AA, BB, and CC
Plasti-Kote, Division of Valspar
OHD 091 620 369
Large Quantity Generator

A Compliance Evaluation Inspection (CEI) of the Plasti-Kote facility located at 1000 Lake Road, Medina, Ohio, was conducted on April 22, 2004. The following people were present for this inspection:

Tom Corpora - Health, Safety & Environmental Manager	Plasti-Kote
Duane Kenyon - Production/Safety Supervisor	Plasti-Kote
Terry Szesny - Director of Operations - Aerosol Coatings	Plasti-Kote
Karen Nesbit - NEDO	OEPA
Brenda Oswald - Environmental Engineer	U.S. EPA

Plasti-Kote, is a manufacturer of aerosol paints and specialty coatings. They have been located in Medina, Ohio for over 75 years. In 1998, Plasti-Kote became a division of Valspar, which is a global corporation with approximately 6500 employees that has been making coatings since 1806. General paints are the bulk of the business, along with products for the Automotive Aftermarket, architectural coatings, and industrial maintenance paints and coatings. The facility has two mixing rooms for paint production, five aerosol can filling lines, and one non-aerosol line. Currently, three areas are designated for 90 day storage, and approximately 31 areas are reserved for satellite accumulation.

In Mixing Room 1, raw paint material is combined with a resin and a solvent, usually acetone. Dry materials, such as pigments and extenders, are added before the mixture is sent for milling. The pasty paint is then altered with a prescribed amount of solvent according to customer specifications. The paint is checked in a Quality Control Lab before being pumped into the can-filling production lines.

Mixing Room 2 is dedicated to the production of Fleckstone. This is a coating that is textured with "fleck." The process is different from that in Mixing Room 1 in that after the raw material is diluted to the proper consistency with solvents, "fleck" is added, and the paint is pumped into a Vorti Sieve, which is a high speed vibrating filter. The colors are then added and mixed in. The paint goes through the Vorti Sieve once more to ensure that the size of the fleck in the final product will be the proper size for the paint guns in the can-filling production lines. This paint also incurs a quality control check before being pumped into the production lines.

The fill lines are organized in an assembly line fashion. The cans are placed on one of 5 tracks and pass through a paint-filling station. When the paint guns become clogged, they are cleaned with a solvent, usually acetone. A valve is dropped in the can before heading into the gas house where an accelerant, such as propane, is added, and the can is sealed. The cans are checked for proper weight, then are placed in a heated water bath to identify leaks. Nozzles and labels are added to complete the product.

Walk-Through of Facility

This facility is exempt from RCRA air emissions regulations of 40 CFR § 265, Subparts AA, and BB. Subpart AA does not apply because the facility does not have any process vents associated with distillation, fractionation, thin film evaporation, solvent extraction, or air stripping units that are not maintained by a Clean Air Act permit. Subpart BB is not applicable because the facility does not have equipment (pumps, compressors, pressure release devices, sampling connections, open-ended valves and lines, valves, flanges or connectors) associated with units as delineated in 40 CFR § 265.1050(b)(1)-(3). Subpart CC does apply to this generator. All containers and totes in 90 day storage, however, were properly closed and inspected.

INTERIM STATUS FACILITIES ORGANIC AIR EMISSION STANDARDS FOR PROCESS VENTS

AA

Facility's Name PLASTI-KOTE

Date 4/22/04 ID# OHD 091 620 369

Use of the words "process vents" means process vents associated with distillation, fractionation, thin-film evaporation, solvent extraction or air or steam stripping operations managing hazardous waste with organic concentrations of at least 10 ppmw (time weight annual average basis).
Note: Total Organic Emissions shall be abbreviated to TOE

(rev. 7/3/96 - EAB-MDEQ)

PROCESS VENTS COVERED BY CAA PERMIT.

NI - not inspected N/A - not applicable

	YES	NO	NI	N/A

APPLICABILITY (40 CFR 265.1030)

1. Manage hazardous waste w/ organic concentrations of at least 10 ppmw in units w/ process vents? (265.1030(b))	DAE	NA

IF YES

a) Are the units subject to the permitting requirements under part 270? (265.1030(b)(1))	DAE	*

OR

b) Are there hazardous waste recycling units with process vents that are located at the facility that is otherwise subject to the permitting requirements? (265.1030(b)(2))	DAE	*

* If the answers to the above questions is no the following regulations do not apply, except you must verify the facility waste has less than 10 ppmw: see 40 CFR 265.1034(d) and 40 CFR 265.1034(e) and this information must be recorded in a log: 40 CFR 265.1035(f).

STANDARDS: PROCESS VENTS (40 CFR 265.1032)

Note: A determination of vent emissions may be based on engineering calculations or tests (265.1032(c)) with any performance tests meeting the requirements of 265.1034(c).

2. Has the owner/operator of a facility with process vents:				
a) Reduced TOE from all affected process vents < 1.4 kg/h (3 lb/h) & 2.8 mg/yr (3.1 tons/yr)? (265.1032(a)(1))	DAE	[ ]	NI	N/A

OR

b) Reduced, by use of a control device (that meets the requirements of 265.1033) the TOE from all affected process vents by 95 weight percent? (265.1032(a)(2))	DAE	[ ]	NI	N/A

Note: If the process vents emit below the limits with out an add-on control device the facility the only additional requirement is 265.1035(f)

STANDARDS: CLOSED-VENT SYSTEMS AND CONTROL DEVICES (40 CFR 265.1033)

3. Was a closed-vent system and control device installed by 12/21/90 or as per an implementation schedule with a completion date as soon as possible but no later than June 21, 1992? (265.1033(a)(2))	DAE	[ ]	NI	N/A
4. If the owner/operator has installed a closed-vent system and control device by their effective date, was: (265.1033(a)(1))				
a) Control device involving vapor recovery designed/operated to recover organic vapors vented to it w/ an efficiency of 95 weight percent or greater? (265.1033(b)) (N/A if TOE for all affected process vents can be attained at an efficiency less than 95 weight percent?)	DAE	[ ]	NI	N/A
b) Enclosed combustion device designed and operated to reduce organic emissions vented to it by 95 weight percent or greater to: (265.1033(c))				
I) Achieve a total organic compound concentration of 20 ppmv?	DAE	[ ]	NI	N/A

OR

ii) Provide minimum resident time of 0.50 seconds at minimum temp. of 760 degrees C? (265.1033(c))	DAE	[ ]	NI	N/A
c) A flare:				
I) Designed/operated w/ no visible emissions except periods not to exceed total of 5 minutes during any 2 consecutive hours? (255.1033(d)(1))	DAE	[ ]	NI	N/A
ii) Operated with a flame present at all times? (265.1033(d)(2))	DAE	[ ]	NI	N/A

		YES	NO	NI	N/A
iii) Used only if: (265.1033(d)(3))					
a) Net heating value of gas being combusted is ≥ 300 Btu/scf if flare is steam or air assisted?	DAE	[ ]		NI	N/A
OR					
b) If the net heating value of the gas being combusted is 200 Btu/scf. or greater if the flare is non-assisted?	DAE	[ ]		NI	N/A
d) Was the steam-assisted or non-assisted flare designed and operated with an exit velocity: (265.1033(d)(4)(I-iii))					
I) Less than 60 ft/s? Except if,	DAE	[ ]		NI	N/A
ii) ≥ 60 ft/s but < 400 ft/s? (Only allowed if net heating value of gas is greater than 1000 Btu/scf)	DAE	[ ]		NI	N/A
iii) Less than the velocity, Vmax and less than 400 ft/s?	DAE	[ ]		NI	N/A
e) Was air-assisted flare designed and operated with an exit velocity less than the velocity Vmax? (265.1033(d)(5))	DAE	[ ]		NI	N/A

Note: The formulas needed to determine #4.d & #4.e. are found in 265.1033(e)(2-5).

f) For a flare was:					
I) Method 22 used to determine compliance with visible emissions? (265.1033(e)(1))	DAE	co rep. said ___ [ ]		NI	N/A
ii) The net heating value of the gas being combusted calculated correctly? (265.1033(e)(2))	DAE	co rep. said ___ [ ]		NI	N/A
iii) The actual exit velocity correctly determined? (265.1033(e)(3))	DAE	co rep. said ___ [ ]		NI	N/A
iv) The maximum allowed velocity calculated correctly? (265.1033(e)(4))	DAE	co rep. said ___ [ ]		NI	N/A
v) The maximum allowed velocity for air assisted flare calculated correctly? (265.1033(e)(5))	DAE	co rep. said ___ [ ]		NI	N/A
5. Did the owner/operator monitor and inspect each control device required to ensure proper operation and maintenance by: (265.1033(f)(1))					
a) Installing/calibrating/maintaining/operating flow indicator w/ record of vent stream flow at least once per hour?	DAE	[ ]		NI	N/A
b) Installing/calibrating/maintaining/operating device to continuously monitor control devices as specified below: (265.1033(f)(2))					
I) Thermal vapor incinerator, a temperature monitoring device equipped with a continuous recorder?	DAE	[ ]		NI	N/A
ii) Catalytic vapor incinerator, a temperature monitoring device equipped with a continuous recorder?	DAE	[ ]		NI	N/A
iii) Flare/heat sensing monitoring device have a continuous recorder giving continuous ignition pilot flame?	DAE	[ ]		NI	N/A
iv) Boiler/process heater w/ design heat input capacity <44MW, a temp. monitoring device w/ a continuous recorder?	DAE	[ ]		NI	N/A
v) Boiler/process heater w/ design heat input capacity ≥44MW, a monitoring device w/ a continuous recorder to measure parameter(s) that indicates good combustion operating practices?	DAE	[ ]		NI	N/A
vi) For a condenser, either: (265.1033(f)(2)(vi))					
a) Monitoring device w/ continuous recorder for concentration of organic compounds in exhaust vent stream?	DAE	[ ]		NI	N/A
OR					
b) A temperature monitor device equipped with continuous recorder?	DAE	[ ]		NI	N/A
vii) A carbon adsorption system that regenerates the carbon bed directly in the control device, either: (265.1033(f)(2)(vi))					
a) Monitoring device w/ continuous recorder for concentration of organic compounds in exhaust vent stream?	DAE	[ ]		NI	N/A
OR					

	YES NO NI N/A
b) Monitor device w/ continuous recorder to measure parameter that indicates the carbon bed is regenerated on a regular predetermined time cycle? DAE	[ ] NI N/A

AND

c) Replaces existing carbon w/ fresh at pre-set interval no longer than carbon service life? (265.1033(g)) DAE	[ ] NI N/A
viii) If using a carbon adsorption system that does not regenerate carbon bed on-site in the control device, the existing carbon will be replaced w/ fresh carbon on a regular basis by either: (265.1033(h)(1-2))	
a) Monitoring the concentration level of the organic compounds regularly and replace the carbon with fresh immediately after break-through?	
I) Monitoring daily? DAE	[ ] NI N/A
ii) Monitoring at interval no greater than 20% of time required to consume total carbon working capacity? DAE	[ ] NI N/A
b) Replace the existing carbon with fresh at regular, predetermined intervals? DAE	[ ] NI N/A
c) Inspecting readings from (except 265.1033(h)) monitoring device(s) at least once each operating day? (265.1033(f)(3)) DAE	[ ] NI N/A

AND

d) If needed, implement necessary corrective measures to ensure control devices work? (265.1033(f)(3)) DAE	[ ] NI N/A

Note: An alternative operational or process parameter may be monitored see 40 CFR 265.1033(l).

6. The closed-vent system(s):	
a) Was it designed for and operated with no visible emissions? (265.1033(j)(1)) DAE	[ ] NI N/A
b) Have initial leak detection monitoring conducted: (265.1033(j)(2))	
I) By date facility becomes subject to these regulations? DAE	[ ] NI N/A
ii) Annually thereafter? DAE	[ ] NI N/A
c) Control detectable emissions (>500 ppm) as soon as possible but: (265.1033(j)(3-4))	
I) No later than 15 calendar days after detected? DAE	[ ] NI N/A
ii) First attempt at repair made no later than 5 calendar days after detection? DAE	[ ] NI N/A
7. Were closed-vent systems and control devices operated at all times when emissions may be vented to them? (265.1033(k)) DAE	co. rep said ___ [ ] NI N/A

TEST METHODS AND PROCEDURE (40 CFR 265.1034)

8. Were correct test methods and procedures used? (265.1034(a))	
a) For a closed-vent system tested for no detectable emissions? (265.1034(b)(1-7)) DAE	[ ] NI N/A
b) To determine compliance with the 10 ppmw and with the total organic compound limit (95%)? (265.1034(c)) DAE	[ ] NI N/A
9. Did the facility determine that the process vents are not subject to the requirements of this subpart? If so, did the owner/operator make an initial determination that the time-weighted annual average total organic concentration managed by the unit is less than 10 ppmw by: (265.1034(d))	
a) Direct measurement? (265.1034(d)(1)) DAE	[ ] NI N/A
b) Using knowledge? (265.1034(d)(2)) DAE	[ ] NI N/A
10. Was the determination that distillation, fractionation, thin-film evaporation, solvent extraction or air or stream stripping operations manage hazardous wastes time-weighted annual average total organic concentration is less than 10 ppmw made as follows: (265.1034(e))	
a) By date the facility is first subject to the regulations or the date the waste is first managed, whichever is first? DAE	[ ] NI N/A
b) For continuously generated waste annually? DAE	[ ] NI N/A

	YES	NO	NI	N/A

OR

c) When there is change in way waste being managed or in the process that generates the waste? (265.1034(e)(3)) DAE	[ ]		NI	N/A

RECORDKEEPING REQUIREMENTS (40 CFR 265.1035)

Note: If there is more than one managed unit the facility can use one recordkeeping system. (265.111035(a)(2))

11. Did the owner/operator record the following information in the facility operating record: (265.1035(b))				
a) The schedule and the rational, if the facility needed to develop an implementation schedule? (265.1035(b)(1)) DAE	[ ]		NI	N/A
b) Up-to-date process vent documentation?				
I) Information & data: (265.1035(b)(2)(I))				
a) Identifying all effected process vents? DAE	[ ]		NI	N/A
b) Annual throughput and operating hours of each effected unit? DAE	[ ]		NI	N/A
c) Estimated emission rates for each effected vent & for overall facility? DAE	[ ]		NI	N/A
d) Location of each effected vent on plot plan? DAE	[ ]		NI	N/A
ii) Information and data supporting determinations of vent emissions and emission reductions achieved by add-on control devices based on engineering calculations or source tests? (265.1035(b)(2)(ii)) DAE	[ ]		NI	N/A
c) If tests were used to determine organic removal efficiency or total organic compound concentration was there a performance test plan, which include: (265.1035(b)(3)(ii)(A-E))				
I) Engineering description of closed vent system and control device including:				
a) Manufacture name and model #? DAE	[ ]		NI	N/A
b) Type of control device? DAE	[ ]		NI	N/A
c) Dimensions? DAE	[ ]		NI	N/A
d) Capacity? DAE	[ ]		NI	N/A
e) Construction materials? DAE	[ ]		NI	N/A
ii) Description of sampling and monitoring procedures, including: (265.1035(b)(3)(iii))				
a) Location? DAE	[ ]		NI	N/A
b) Equipment? DAE	[ ]		NI	N/A
c) Frequency? DAE	[ ]		NI	N/A
d) Procedures? DAE	[ ]		NI	N/A
d) Documentation on the closed-vent systems and the control devices required in 265.1033, specifically: (265.1035(b)(4))				
I) List of all information, references and sources used to prepare documentation? (265.1035(b)(4)(I)) DAE	[ ]		NI	N/A
ii) Records with dates of compliance tests? DAE	[ ]		NI	N/A
iii) Engineering calculations for design analysis/specifications/drawings/schematics/piping/instrument diagrams include: (265.1035(b)(4)(iii))				
a) Thermal vapor incinerators, consider vent stream composition/constituent composition/flow rate. Included design minimum, average temperature & residence time in the combustion zone? (265.1035(b)(4)(iii)(A)) DAE	[ ]		NI	N/A
b) Catalytic vapor incinerators, consider vent stream composition/constituent composition/flow rate. Include design minimum & average temperature across the catalyst bed inlet and outlet? (265.1035(b)(4)(iii)(B)) DAE	[ ]		NI	N/A
c) Boiler or process heater, consider vent stream composition/constituent composition/flow rate. Include design minimum & average flame zone temperatures, combustion zone residence time & where vent system is introduced? (265.1035(b)(4)(iii)(C)) DAE	[ ]		NI	N/A
d) Flare, consider vent stream composition/constituent composition/flow rate. Design analysis requirements are in 265.1033(d)? (265.1035(b)(4)(iii)(D)) DAE	[ ]		NI	N/A

		YES NO NI N/A
e) Condenser, consider vent stream composition/constituent composition/flow rate/relative humidity & temp. Include design outlet organic compound concentration level, design average temp. of the exhaust vent stream, and the design average temp. of the coolant fluid at the condenser outlet and inlet? (265.1035(b)(4)(iii)(E))	DAE	[ ] NI N/A
f) Carbon adsorption system that regenerates bed on-site in the control device, consider the vent stream composition/constituent concentrations/flow rate/relative humidity/temperature. Include design exhaust vent stream organic compound concentration level/number & capacity of carbon beds/type & capacity of activated carbon/total stream flow/bed steaming/cooling/drying cycles/temp. regeneration/time of regeneration/service life? (265.1035(b)(4)(iii)(F))	DAE	[ ] NI N/A
g) Carbon adsorption system that does not regenerate on-site in a control device, consider the vent stream composition/constituent concentrations/flow rate/relative humidity/temperature. Include the design outlet organic concentration level/capacity of the bed/type & capacity of the carbon in the bed/replacement interval? (265.1035(b)(4)(iii)(G))	DAE	[ ] NI N/A
e) A statement signed/dated by the owner/operator certifying that the operating parameters used in the design analysis reasonably represent the conditions that exist when the hazardous waste management unit is or would be operating at the highest load or capacity level reasonably expected to occur? (265.1035(b)(iv))	DAE	[ ] NI N/A
f) A statement signed/dated by the owner/operator certifying that the control device is designed to operate at an efficiency of $\geq$ 95% (are alternatives)? A statement from the device manufacture or vendor certifying that the control equipment meets the design specifications will suffice? (265.1035(b)(v))	DAE	[ ] NI N/A
g) If test performance tests are used to demonstrate compliance, all test results? (265.1035(b)(vi))	DAE	[ ] NI N/A
h) Design documentation & monitoring/operating & inspection information for each closed-vent system/control device recorded, kept up-to-date and including: (265.1035(c))		
I) Description and date of each modification? (265.1035(c)(1))	DAE	[ ] NI N/A
ii) Id operating parameters/describe monitoring devices/diagram monitoring sensor locations? (265.1035(c)(2))	DAE	[ ] NI N/A
iii) Monitoring/operating & inspection information required in 265.1033(f-j)? (265.1035(c)(3))	DAE	[ ] NI N/A
iv) Date, time and duration when monitoring values exceed the value established? (254.1035(c)(4))	DAE	[ ] NI N/A
v) Explanation for each period the control device operating parameter exceeded the design value & the measures implemented to correct the control device? 265.1035(c)(5))	DAE	[ ] NI N/A
vi) Carbon adsorption systems where the carbon is regenerated in the control device or a system that changes the carbon at a regular, predetermined interval give the date when existing carbon is replaced? (265.1035(c)(6))	DAE	[ ] NI N/A
vii) For a carbon adsorption system that changes the carbon at breakthrough have a log that records: (265.1035(c)(7)(I-ii))		
a) Date and time of breakthrough and the monitoring device reading?	DAE	[ ] NI N/A
b) Date when existing carbon is replaced with fresh carbon?	DAE	[ ] NI N/A
viii) Date of control device start up and shut down? (265.1035(c)(8))	DAE	[ ] NI N/A
I) Control device other than thermal or catalytic vapor incinerator/flare/boiler/process heater/condenser/carbon adsorption bed, the monitoring/inspection information indicating proper operation & maintenance? (265.1035(e))	DAE	[ ] NI N/A
j) Up-to-date information/data used to determine if a process vent falls under (265.1032) & supporting documentation (265.1034(d)(2)) when knowledge of the nature of hazardous waste stream or process is used? (265.1035(f))	DAE	[ ] NI N/A
12. Are records of monitoring, operating and inspection information kept at least 3 years? (265.1035(d))	DAE	[ ] NI N/A

INTERIM STATUS FACILITIES AND FULLY REGULATED GENERATOR ORGANIC AIR EMISSION STANDARDS FOR EQUIPMENT LEAKS

BB

Facility's Name PLASTI-KOTE

Date 4/22/04 ID# OHD 091 620 369

Use of the words "process vents" means process vents associated with distillation, fractionation, thin-film evaporation, solvent extraction or air or steam stripping operations managing hazardous waste with organic concentrations of at least 10 ppmw (time weight annual average basis).

Note: Total Organic Emissions shall be abbreviated to TOE

Note: Equipment with closed-vent systems and control devices shall comply with the provisions of section 265.1033.

(rev. 4/25/97 [z/bb.new] - EAB-MDEQ)

NI - not inspected N/A - not applicable

Only one pump used in the facility for transfering waste from a process to a satellite drum.

	YES	NO	NI	N/A

APPLICABILITY (40 CFR 265.1050)

1. If the equipment contains or contacts hazardous waste w/ organic concentrations of at least 10 percent by weight:				
a) Are the units subject to the permitting requirements of part 270? (265.1050(b)(1))	DAE			*

OR

b) Are there hazardous waste recycling units located at the facility that are otherwise subject to the permitting requirements? (265.1050(b)(2))	DAE			*

* If the answers to the above questions are no the following regulations do not apply.

STANDARDS: PUMPS IN LIGHT LIQUID (40 CFR 265.1052)

Note: Delays in repair are allowed see 265.1059 (#37)

Note: Did the owner/operator subject to the provisions of this subpart comply with the required test methods and procedures: (265.1063(b-I)) (#41)

2. Pump equipped w/ duel mechanical seal system that includes a barrier fluid system? If yes, its exempt from monthly monitoring (#5) and visual inspections (#6) if: (265.1052(d))				NI N/A
a) Each duel mechanical seal system is:				
I) Operated with a barrier fluid with pressure greater than the pump stuffing box pressure. (265.1052(d)(1)(I))	DAE	[ ]		NI N/A

OR

ii) Has a barrier fluid degassing reservoir connected by closed-loop to a control device. (265.1052(d)(1)(ii))	DAE	[ ]		NI N/A

OR

iii) System that purges the barrier fluid into a hazardous waste stream w/no detectable emissions? (265.1052(d)(1)(iii))		[ ]		NI N/A
b) Barrier fluid is not a hazardous waste w/ organic concentrations 10% or greater by weight. (265.1052(d)(2))	DAE	[ ]		NI N/A
c) Each barrier fluid system equipped w/ a sensor to detect failure of the seal/barrier fluid system. (265.1052(d)(3))	DAE	[ ]		NI N/A
d) Each calendar week pump has visual inspection for signs of liquids dripping from pump seals. (265.1052(d)(4))	DAE	[ ]		NI N/A
e) Each sensor is checked: (265.1052(d)(5)(I))				
I) Daily.	DAE	[ ]		NI N/A

OR

ii) Equipped with audible alarm that is checked monthly to see if working.	DAE	[ ]		NI N/A
f) Owner/operator has determined a criteria indicating failure of the seal/barrier fluid system. (265.1052(d)(5)(ii))	DAE	[ ]		NI N/A
g) Indications of liquids dripping from pump seal/sensor means failure of seal/barrier fluid system & a leak has been detected: (265.1052(d)(6)(I))				
I) Was it repaired as soon as practicable but no later than 15 calendar days after detected? (265.1052(d)(6)(ii))	DAE	[ ]		NI N/A
ii) A first attempt at repair was made no later than 5 calendar days after leak is detected? (265.1052(d)(6)(iii))	DAE	[ ]		NI N/A
The pump designed as in 264.1064(g)(2) for no detectable emissions as indicated by an instrument reading of <500 ppm above background? Yes, pump exempt from monthly monitoring (#5), visual monitoring (#6), repairs (#7a & #7b) and barrier fluid system (#2) if: (265.1052(e))				NI N/A
a) It does not have an externally actuated shaft penetrating the pump housing. (265.1052(e)(1))	DAE	[ ]		NI N/A

		YES	NO	NI	N/A
b) It operates with no detectable emissions as indicated w/ emission reading of < 500 ppm. (265.1052(e)(2))	DAE	[ ]		NI	N/A
c) Is tested for compliance initially, annually and when requested by Regional Administrator. (265.1052(e)(3))	DAE	[ ]		NI	N/A
4. Is the pump equipped with a closed-vent system capable of capturing and transporting any leakage from seal(s) to the control device? If yes, the pump is exempt from monthly monitoring (#5), visual monitoring (#6), repairs (#7a & #7b), barrier fluid system (#2) and no detectible emission (#3). (265.1052(f))	DAE			NI	N/A
5. Is each pump in light liquid service monitored monthly to detect leaks? (265.1052(a)(1))	DAE	[ ]		NI	N/A
6. Does each pump in light liquid service have a visual inspection each calendar week for indications of liquid dripping? (265.1052(a)(2))	DAE	[ ]		NI	N/A
7. Was an instrument reading of 10,000 ppm or greater measured or were there are any indications of liquids dripping from the pump seal? If yes, a leak is detected and:	DAE			NI	N/A
a) Was it repaired as soon as practicable but no later than 15 calendar days after detected? (265.1052(c)(1))	DAE	[ ]		NI	N/A
b) Was a first attempt at repair made no later than 5 calendar days after leak is detected? (265.1052(c)(2))	DAE	[ ]		NI	N/A

STANDARDS: COMPRESSORS (40 CFR 265.1053)

NOTE: Delays in repair are allowed see 265.1059 (#37)

		YES	NO	NI	N/A
8. Is the compressor designed as described in 265.1064(g)(2), for no detectable emissions indicated by instrument reading of < 500 ppm above background? If yes the compressor is exempt from seal system and operation (#10-11), barrier fluid concentration (#12), barrier system sensor(#13-14), criteria for failure (#15), leak detection/repair (#16) and closed-vent (#9). (265.1053(I))	DAE			NI	N/A
9. Is the compressor equipped with a closed-vent system capable of capturing and transporting leakage from the seal(s) to a control device in compliance w/ 265.1060? If yes, the compressor is exempt from seal system (#10) and seal system operation (#11). (265.1053(h))	DAE			NI	N/A
10. Each compressor equipped w/ seal system that has barrier fluid system that prevents leakage of TOE? (265.1053(a))	DAE	[ ]		NI	N/A
11. Is each compressor seal system: (265.1053(b))					
a) Operated with the barriers fluid at a greater pressure than the stuffing box pressure? (265.1053(b)(1))	DAE	[ ]		NI	N/A
OR					
b) Equipped with a barrier fluid system connected by a closed-vent system to a control device? (265.1053(b)(2))	DAE	[ ]		NI	N/A
OR					
c) Equipped with a system that purges the barrier fluid system with no detectable emissions? (265.1053(b)(3))	DAE	[ ]		NI	N/A
12. Is the barrier fluid system a hazardous waste w/ an organic concentration of 10% or greater by weight? (265.1053(c))	DAE		[ ]	NI	N/A
13. Each barrier system equipped w/ a sensor to detect failure of the seal/barrier fluid system? (265.1053(d))	DAE	[ ]		NI	N/A
14. Is each barrier system sensor checked: (265.1053(e)(1))					
a) Daily?	DAE	[ ]		NI	N/A
OR					
b) Equipped with audible alarm that is checked monthly to see if working?	DAE	[ ]		NI	N/A
UNLESS					
c) The compressor is located at an unmanned plant then is the sensor checked daily?	DAE	[ ]		NI	N/A
15. Has the owner/operator determined a criterion to indicate failure of the seal/barrier fluid system? (265.1053(e)(2))	DAE	[ ]		NI	N/A
16. Did the sensor indicates failure of the seal/barrier fluid system? If yes, a leak is detected and: (265.1053(f))	DAE			NI	N/A

		YES	NO	NI	N/A
a) Was it repaired as soon as practicable but no later than 15 calendar days after detected? (265.1052(g)(1))	DAE	[ ]		NI	N/A
b) Was a first attempt at repair was made no later than 5 calendar days after leak is detected? (265.1052(g)(2))	DAE	[ ]		NI	N/A

STANDARDS: PRESSURE RELIEF DEVICES IN GAS/VAPOR SERVICE (40 CFR 265.1054)

NOTE: Delays in repair are allowed see 265.1059 (#37)

17. Is the pressure relief device equipped with a closed-vent system capable of capturing and transporting leakage to a control devices specified in 265.1060? If yes, the device is exempt from relief device monitored for no detectable emissions (#18), specifications to reset device and time frame (#19 & #20). (265.1054(c))	[redacted]		NI N/A
18. Pressure relief devices in gas/vapor service operated w/ no detectable emissions indicated by an instrument reading of < 500 ppm above background, except during pressure releases? (265.1054(a))	[redacted]	[ ]	NI N/A
19. After a pressure release, was the device returned to a condition of no detectable emissions indicated by an instrument reading of < 500 ppm above background, as soon as practical but no later than 5 calendar days? (265.1054(b)(1))	[redacted]	[ ]	NI N/A
20. No later than 5 calendar days after a pressure release, is the pressure relief device monitored to confirm no detectable emissions indicated by an instrument reading of < 500 ppm above background,? (265.1054(b)(2))	[redacted]	[ ]	NI N/A

STANDARDS: SAMPLING CONNECTING SYSTEMS (40 CFR 265.1055)

21. Is the sampling system *in situ*? If yes, the system isn't required to have closed-vent or closed-purge system (#22 & #23). (265.1055(c))	[redacted]		NI N/A
22. Is each sampling connection system equipped with a closed-purge system or closed-vent system? (265.1055(a))	[redacted]	[ ]	NI N/A
23. Does each closed-purge or closed-vent system: (265.1055(b))			
a) Return purged hazardous waste stream directly to hazardous waste management process line w/ no detectable emissions? (265.1055(b)(1))	[redacted]	[ ]	NI N/A

OR

b) Collect and recycle the purged hazardous waste stream with no detectable emissions? (265.1055(b)(2))	[redacted]	[ ]	NI N/A

OR

c) Designed/operated to capture/transport all purged hazardous waste stream to a control device? (265.1055(b)(3))	[redacted]	[ ]	NI N/A

STANDARDS: OPEN-ENDED VALVES OR LINES (40 CFR 265.1056)

Note: Delays in repair are allowed see 265.1059 (#37)

Note: Did the owner/operator subject to the provisions of this subpart comply with the required test methods and procedures: (265.1063(b-I)) (#41)

24. Is each open-ended valve or line equipped with a cap, blind flange, plug or second valve? (265.1056(a)(1))	[redacted]	[ ]	NI N/A
25. Cap/blind flange/plug/second valve always seal open end except when waste must flow through? (265.1056(a)(2))	[redacted]	[ ]	NI N/A
26. If using a second valve, is the first valve closed before the second? (265.1056(b))	[redacted]	[ ]	NI N/A
27. If a double block and bleed system is used and the bleed line/valve stays open during venting, is the line between the block valves have cap/blind flange/plug/second value and sealed at all other times? (265.1056(c))	[redacted]	[ ]	NI N/A

STANDARDS: VALVES IN GAS/VAPOR SERVICE OR IN LIGHT LIQUID SERVICE (40 CFR 265.1057)

Note: There are alternate standards for valves in gas/vapor or light liquid service where owners/operators may elect to have all valves within a hazardous waste management unit comply with alternative standards which: (1) allows no greater than 2% of the valves to leak. (265.1061(a-d) and (2) allows for skip period leak detection and repair. (265.1062(a-b))

Note: Delays in repair are allowed see 265.1059 (#37)

Valve designated as an unsafe-to-monitor valve as described in 265.1064(h)(1). If yes, the valve is exempt from monthly monitoring (#31) if: (265.1057(g))	[redacted]		NI N/A

	YES	NO	NI	N/A
a) The owner/operator of the valve determines that the valve would be unsafe to monitor because monitoring personnel would be exposed to an immediate danger. (265.1057(g)(1)) DAE	[ ]		NI	N/A
b) The owner/operator of the valve adheres to a written plan that requires monitoring of the valve as often as possible during safe-to-monitor times. (265.1057(g)(2)) DAE	[ ]		NI	N/A
29. Valve designated as a difficult to-monitor valve in 265.1064(h)(2). If yes, the valve is exempt from monthly monitoring (#31) if: (265.1057(h))			NI	N/A
a) The owner/operator of the valve determines the valve cannot be monitored without elevating personnel more than 2 meters above a support surface. (265.1057(h)(1))	[ ]		NI	N/A
b) Hazardous waste management unit where valve is located was in operation before 6/21/90. (265.1057(h)(2))	[ ]		NI	N/A
c) Follow written plan that requires monitoring of valve at least once per calendar year. (265.1057(h)(3))	[ ]		NI	N/A
30. Valve designated for no detectable emissions, as indicated bt instrument reading of < 500 ppm above background, and described in 265.1064(g)(2) . If yes, the valve is exempt from monthly monitoring (#31) if: (265.1057(f))			NI	N/A
a) It has no external actuating mechanism in contact with the hazardous waste streams. (265.1057(f)(1))	[ ]		NI	N/A
b) It is operated with emissions < 500 ppm above background. (265.1057(f)(2))	[ ]		NI	N/A
c) It is tested for emissions initially and then annually. (265.1057(f)(3))	[ ]		NI	N/A
31. Is each valve, other than unsafe or difficult-to-monitor or no detectible emissions (#28-30), in gas/vapor or light liquid service monitored monthly for leaks? (265.1057(a)) (exemptions 33 & 34)	[ ]		NI	N/A

OR

32. Any valve for which a leak has not been detected for two successive months may be monitored the first month of every succeeding quarter, until a leak is detected? (265.1057(c)(1))	[ ]		NI	N/A

AND

33. If the monitoring was every quarter and a leak is detected was the monthly monitoring resumed until a leak was not detected for 2 consecutive months? (265.1057(c)(2))	[ ]		NI	N/A
34. When a leak is detected, by an instrument reading of 10,000 ppm or greater: (265.1057(b)): (265.1057(d)(1))				
a) Was it repaired as soon as practicable but not later than 15 calendar days after detected? (265.1052(d)(1))	[ ]		NI	N/A
b) Was a first attempt at repair made no later than 5 calendar days after leak is detected? (265.1052(d)(2))	[ ]		NI	N/A
c) Was the first repair attempt include, but not limited to: (265.1057(e))				
I) Tightening of bonnet bolts?	[ ]		NI	N/A
ii) Replacement of bonnet bolts?	[ ]		NI	N/A
iii) Tightening of packing gland nuts?	[ ]		NI	N/A
iv) Injection of lubricant into lubricating packing?	[ ]		NI	N/A

STANDARDS: PUMPS AND VALVES IN HEAVY LIQUID SERVICE, PRESSURE RELIEF DEVICES IN LIGHT LIQUID OR HEAVY LIQUID SERVICE AND FLANGES AND OTHER CONNECTORS (40 CFR 265.1058)

NOTE: Delays in repair are allowed see 265.1059 (#37)

35. Are pumps and valves in heavy liquid service, pressure relief devices in light or heavy liquid service and flanges and other connectors monitored within 5 days if evidence of a potential leak is found by visual, audible, olfactory or other detection method? (265.1058)(a))	[ ]		NI	N/A
36. If a leak was detected, by an instrument reading of 10,000 ppm or greater: (265.1058(b))			NI	N/A
a) Was it repaired as soon as practicable but no later than 15 calendar days after detected? (265.1058(c)(1))	[ ]		NI	N
b) Was a first attempt at repair was made no later than 5 calendar days after leak is detected? (265.1058(c)(2))	[ ]		NI	N/A

		YES	NO	NI	N/A
c) Was the first repair attempt include, but not limited to: (265.1058(d))					
i) Tightening of bonnet bolts?	DAE	[ ]		NI	N/A
ii) Replacement of bonnet bolts?	DAE	[ ]		NI	N/A
iii) Tightening of packing gland nuts?	DAE	[ ]		NI	N/A
iv) Injection of lubricant into lubricating packing?	DAE	[ ]		NI	N/A

STANDARDS: DELAY OF REPAIR (40 CFR 265.1059)

37. Was there a delay in repair of equipment for which leaks have been detected? If yes, the delay is allowed if:	DAE		NI	N/A
a) Was the repair technically infeasible without a shutdown of the hazardous waste management unit and did the repair occur before the end of the next shutdown? (265.1059(a))	DAE	[ ]	NI	N/A
b) Was the equipment isolated from the hazardous waste management unit and the unit does not contain or contact hazardous waste with organic concentrations at least 10% by weight. (265.1059(b))	DAE	[ ]	NI	N/A
38. Was there a delay in repair of a valve? If yes, the delay is allowed if:	DAE		NI	N/A
a) Determine emissions from purged material from immediate repair are greater than emissions resulting from a delay of the repair. (265.1059(c)(1))		[ ]	NI	N/A
b) When repaired, the purged material is collected and destroyed or recovered in a control device. (265.1059(c)(2))	DAE	[ ]	NI	N/A
39. Was there a delay in repair of a pump? If yes, the delay will be allowed if:	DAE		NI	N/A
a) Repair requires the use of a duel mechanical seal system that includes a barrier fluid system. (265.1059(d)(1))	DAE	[ ]	NI	N/A
b) Repair is completed as soon as practicable but within 6 months. (265.1059(d)(2))	DAE	[ ]	NI	N/A
40. Was there a delay in repair of a valve beyond a hazardous waste management unit shutdown? If yes, the delay will be allowed until the next shutdown or longer if the shutdown is within 6 months if: (265.1059(e))	DAE		NI	N/A
a) The valve assembly replacement is necessary during shutdown.	DAE	[ ]	NI	N/A
b) Valve assembly supplies have been depleted & supplies were sufficiently stocked before supplies were depleted.	DAE	[ ]	NI	N/A

TEST METHODS AND PROCEDURES (40 CFR 265.1063)

41. Did the owner/operator subject to the provisions of this subpart comply with the required test methods and procedures: (265.1063(b-l))				
a) For leak detection monitoring? (265.1063(b))	DAE	[ ] ___	NI	N/A
b) For 'no detectible' emissions determination? (265.1063(c))	DAE	[ ] ___	NI	N/A
c) To determine if each piece of equipment contains or contacts a hazardous waste w/ organic concentrations $\geq$ 10% by weight? (265.1063(d))	DAE	[ ] ___	NI	N/A
d) To determine if pumps or valves are in light liquid service? (265.1063(h))	DAE	[ ] ___	NI	N/A
e) To determine if the control device achieved 95 weight percent organic emissions? (265.1063(l))	DAE	[ ] ___	NI	N/A
42. Were samples used in determine the percent organic content representative of the highest TOC hazardous waste that is expected to be contained in or contact the equipment? (265.1063(g))	DAE	[ ] ___	NI	N/A

RECORDKEEPING REQUIREMENTS (40 CFR 265.1064)

Note: Owners/operators with more than one hazardous waste management unit, subject to these regulations, may use one recordkeeping system if each unit is identified.

Did the owners/operators record the following information in the operating record for each piece of equipment subject to Subpart BB? (265.1064(b))

		YES	NO	NI	N/A
a) Equipment identification number and hazardous waste management unit identification? (265.1064(b)(1)(I))	DAE	[ ]		NI	N/A
b) Approx. location(s) of the equipment (e.g., identify unit on facility plot plan)? (265.1064(b)(1)(ii))	DAE	[ ]		NI	N/A
c) Type of equipment (eg: pump or pipeline valve)? (265.1064(b)(1)(iii))	DAE	[ ]		NI	N/A
d) Percent-by-weight total organics in the hazardous waste stream at the equipment? (265.1064(b)(1)(iv))	DAE	[ ]		NI	N/A
e) State of the hazardous waste at the equipment (eg: liquid or gas/vapor)? (265.1064(b)(1)(v))	DAE	[ ]		NI	N/A
f) Method of compliance w/ the standard (monthly leak detection/repair or equipped w/ dual mechanical seals?	DAE	[ ]		NI	N/A
g) Implementation schedule, if facility can't install a closed-vent system & control device in time?(265.1064(b)(2))	DAE	[ ]		NI	N/A
h) A performance test plan if the owner/operator chose to use test data to demonstrate the organic removal efficiency or total organic compound concentration by the control device? (265.1064(b)(3))	DAE	[ ]		NI	N/A
I) Include documentation of compliance with the closed-vent and control device standards? (265.1064(b)(4))	DAE	[ ]		NI	N/A
j) If a leak is detected?					
I) A weatherproof & readily visible identification attached to the leaking equipment and marked with: (265.1064(c)(1))					
a) The equipment i.d. number?	DAE	[ ]		NI	N/A
b) Date evidence of a potential leak was found?	DAE	[ ]		NI	N/A
c) Date leak was detected?	DAE	[ ]		NI	N/A

Note: The identification on equipment, except a valve, may be removed after repair. (265.1064(c)(2))
Note: The identification on a valve may be removed after being monitored for two successive months without leaks. (265.1064(c)(3))

ii) In an inspection log the following information? (265.1064(d))					
a) Instrument, operator and equipment id number? (265.1064(d)(1))	DAE	[ ]		NI	N/A
b) Date evidence of a potential leak was found? (265.1064(d)(2))	DAE	[ ]		NI	N/A
c) Date leak was detected? (265.1064(d)(3))	DAE	[ ]		NI	N/A
d) Date of each attempt to repair the leak? (265.1064(d)(3))	DAE	[ ]		NI	N/A
e) Repair methods applied in each attempt to repair the leak? (265.1064(d)(4))	DAE	[ ]		NI	N/A
f) "Above 10,000" instrument readings? (265.1064(d)(5))	DAE	[ ]		NI	N/A
g) "Repair delayed" and the reason? (265.1064(d)(6))	DAE	[ ]		NI	N/A
h) Documentation supporting delay in valve repair? (265.1064(d)(7))	DAE	[ ]		NI	N/A
I) Signature of owner/operator whose decision it was not to repair until shutdown? (265.1064(d)(8))	DAE	[ ]		NI	N/A
j) If the repair is not done in 15 days the expected date of a successful repair? (265.1064(d)(9))	DAE	[ ]		NI	N/A
k) The date of successful repair of the leak? (265.1064(d)(10)	DAE	[ ]		NI	N/A
iii) Up-to-date design documentation, monitoring, operating, inspection information for closed-vent & control devices? (265.1064(e))	DAE	[ ]		NI	N/A
iv) Control device (other than thermal or catalytic vapor incinerator/flare/boiler/process heater/condenser/carbon adsorption system) have monitoring/inspection information indicating proper operation/maintenance of control device? (265.1064(f))	DAE	[ ]		NI	N/A
v) The following information regarding the equipment recorded in a log: (265.1064(g))					
a) List of identification numbers for the equipment subject to the requirements and equipment designated for no detectable emissions? (265.164(g)(1)&(2)(I))	DAE	[ ]		NI	N/A
b) The designation of the equipment signed by the owner/operator? (265.1064(g)(2)(ii))	DAE	[ ]		NI	N/A
c) List of identification numbers for pressure relief devices? (265.1064(g)(3))	DAE	[ ]		NI	N/A
d) For each compliance test:					

		YES	NO	NI	N/A
l) Dates of each test? (265.1064(g)(4)(I))	DAE	[ ]		NI	N/A
2) Background level measured during each test? (265.1064(g)(4)(ii))	DAE	[ ]		NI	N/A
3) The maximum instrument reading measured at the equipment during each test? (265.1064(g)(4)(iii))	DAE	[ ]		NI	N/A
e) List of all identification numbers for equipment in vacuum service? (265.1064(g)(5))	DAE	[ ]		NI	N/A
vi) A log with a list of identification numbers for the valves that are designated unsafe or difficult to monitor, an explanation stating why they are unsafe or difficult and the plan for monitoring? (265.1064(h)(1-2))	DAE	[ ]		NI	N/A
vii) For valves in gas/vapor or light liquid service with alternative standards the operating record will record: (265.1064(I))					
a) A schedule of monitoring? (265.1064(I)(1))	DAE	[ ]		NI	N/A
b) The percent of valves found leaking during each monitoring period? (265.1064(I)(2))	DAE	[ ]		NI	N/A
viii) Is the following information shall be recorded in a log and kept in the operating record: (265.1064(j))					
a) Criteria for failure of seal system indicated by sensor used w/ light liquid service pumps? (265.1064(j)(1))	DAE	[ ]		NI	N/A
b) Criteria for failure of seal system indicated by sensor used w/ compressors? (265.1064(j)(1))	DAE	[ ]		NI	N/A
c) Any changes to these criteria and the reason for change? (265.1064(j)(2))	DAE	[ ]		NI	N/A
ix) The following information kept in a log and used to determine exemptions for the hazardous waste management unit: (265.1064(k))					
a) An analysis determining the design capacity of the management unit? (265.1064(k))	DAE	[ ]		NI	N/A
b) A statement listing the hazardous waste influent to and effluent from each unit and analysis determining whether the waste is a heavy liquid? (265.1064(k)(2))	DAE	[ ]		NI	N/A
c) Up-to-date analysis/supporting data used to determine if equipment is subject to standards? (265.1064(k)(3))	DAE	[ ]		NI	N/A
d) Documentation when knowledge of the hazardous waste stream or process is used? (265.1064(k)(3))	DAE	[ ]		NI	N/A
e) Any new determinations if the owner/operator takes any action that could result in an increase of the organic content of the waste? (265.1064(k)(3))	DAE	[ ]		NI	N/A
43. Are records of equipment leak information in 265.1064(d) and closed-vent and control device information in 265.1064(e) kept 3 years? (265.1064(1))	DAE	[ ]		NI	N/A

Comments: _____

_____

PLASTI-KOTE
APRIL 22, 2004
OHD 091 620 369

CC

Inspection Checklist for Subpart CC: Air Emission Standards (Containers)

Item # 40 CFR:

CC-1	265.1080	Do any of the following exclusions apply? If yes, please circle.	YES	NO

Applicability: The air emission requirements apply to units subject to subpart I * unless the following apply (circle if applicable):

1. Waste was placed in unit prior to Oct. 6, 1996, and none has been added since.
2. The container capacity is less than .1 cubic meter (26 gallons)
3. A unit (e.g. tank) has stopped adding waste and is undergoing closure
4. The unit is used solely for onsite treatment or storage as a result of remedial activities required under corrective action, Superfund, or other similar state program
5. The unit is used solely to manage radioactive mixed waste
6. The unit is regulated by and operates in accordance with Clean Air Act regulations

***Note: 1. Satellite containers are exempt 2. CESQG's and SQG's are exempt**

CC-2	265.1083	Do any of the following exemptions apply? If yes, please circle	YES	NO

General Standards: The owner/operator must control air emissions from waste management units except the unit is exempt if (please circle if applicable):

1. All hazardous waste entering the unit has an average VO concentration at the point of origination less than 500 parts per million by weight (waste determination required)
2. The organic content of all waste entering the unit has been reduced by one of the 8 acceptable destruction or removal processes.
3. The unit is a tank used for certain biological treatment
4. The hazardous waste placed in the unit meets the LDR numerical concentration limits or has been treated using the specified LDR treatment technology (for organics)
5. The unit is a tank used for bulk feed to an incinerator and meets certain requirements

CC-3	265.1084	Waste Determination:	Determination Not Needed	Determination Needed

Was the VO concentration properly determined for each waste which the facility manages in a unit which does not meet Subpart CC requirements? The concentration must be determined by either direct measurement or knowledge. Please see 265.1084 for specific requirements for measurement and knowledge. Determination is not needed for waste managed in containers which meet standards. It may be necessary to evaluate container management prior to requiring VO concentration determination.

#	NA=Not Applicable, NI=Not Inspected, OK= In Compliance, DF= Deficiency	NA	NI	OK	DF

CONTAINER MANAGEMENT 265.1087

Level 1	Level 2	Level 3
Larger than 26.4 gallons and less than or equal to 122 gallons, or larger than 122 gallons and do not manage H.W. in light material service	Larger than 122 gallons and manage H.W. "in light material service" (definition at 265.1081) TOTES	Larger than 26.4 gallons and treat H.W. by a stabilization process
CC-4 265.1087 Controls		
One of the following: -Use containers that meet DOT requirements -Use a cover and control with no visible gaps, holes or other open spaces into the interior of the container -Use organic vapor suppression on or above the container 265.1087(c)	One of the following: -Use containers that meet DOT requirements -Use containers that operate with no detectable emissions (method 21) -Use containers that are demonstrated to be vapor-tight within the last 12 months (method 27) 265.1087(d)	-Containers used to stabilize H.W. with volatile organics greater than 500 ppm -For waste stabilized in a container either: 1.container must be vented directly to a control device; or 2.container is vented inside an enclosure which is exhausted through a closed vent to a control device -Conservation vents are not allowed 265.1087(b)(2)

Level 1			Level 2	Level 3			
#	NA=Not Applicable, NI=Not Inspected, OK= In Compliance, DF= Deficiency			NA	NI	OK	DF
CC -5	265.1087	Waste transfer requirements					
No waste transfer requirements apply			-Waste transfer requirements apply regardless of container alternative used in level 2 -Transfer waste into or out of a container in such a manner as to minimize exposure of the waste to the atmosphere. Acceptable methods include a submerged fill pipe, vapor recovery system, or fitted opening with a line purge 265.1087(b)(3)	Not applicable			
CC-6	265.1087	Operating requirements				OK	
The covers, openings, and closure devices should be closed except: 1. When transferring H.W. in and out of the containers 2. between batch transfer not exceeding 15 minutes between transfer (note: if the person performing the transfer leaves the area, or the process shuts down, the container must be closed) 3. While performing sampling and equipment access 4. Conservation and safety vents are allowed -Containers may be open while performing sampling or equipment access -Safety valves and conservation vents may be used if normally left in close position -A cover need not to be on a RCRA empty container, as defined in 40 CFR 261.7 265.1087(c)(3), (d)(3)				-If the vapors are directly vented to a control device, there are specific design and operating criteria that must be met same as tanks that have closed vent and control device systems -If an enclosure is used, the enclosure must meet the design and operating criteria specified in "Procedure T-Criteria for and Verification of a Permanent or Temporary Total Enclosure" under 40 CFR 52.741 The container, enclosure, control device or closed vent system may have safety relief devices.			
CC-7	265.1089	Inspection requirements				OK	
Minimal inspection required: - when facility accepts container and it is not emptied within 24 hours -if wastes are stored greater than a year, then visually inspect once a year If inspections are required, facility must develop written plan and schedule to perform inspection 265.1087(c)(4), (d)(4)				Inspection requirements are the same as for tanks			
CC- 8	265.1087	Repair requirements		NA			
When a defect is detected; attempt to repair within 24 hours must be made and: 1. Repair within 5 calendar days or empty and remove the container from service 2. Do not use until defect is repaired 265.1087(c)(4), (d)(4)				Necessary corrective measures shall be immediately implemented to ensure that the control device is operated in compliance			
CC- 9	265.1090	Recordkeeping requirements				OK	
-If container exceeds 122 gallons and does not meet DOT standards, records indicating that the container is not managing H.W. in light material service			Since Level 2 waste is "in light material service", no records need to be kept	Depends upon how the organic emissions are vented: -If an enclosure is used, records must be maintained for the most recent set of calculations and measurements performed to verify that the enclosure meets the criteria of a permanent total enclosure (Procedure T) -Records for the closed vent and control device system are the same for those used on tanks(265.1090)(e)			

Comments:

RCRA HAZARDOUS WASTE GENERATOR INSPECTION CHECKLIST

Company: PLASTI KOTE EPA ID#: OHD

Street: 1000 LAKE ROAD City: MEDINA

County: MEDINA State: Ohio Zip: 44256

Mailing Address: ——
(If different from above)

Telephone: 330-725-4511 Fax #: 330-723-3674

Owner/ Operator: VALSPAR
(If different from above)

Street: 1101 THIRD STREET SOUTH

City: MINNEAPOLIS, MN State: Ohio Zip: 55415

Inspection Date(s): APRIL 2 Time(s): ——

Inspection Announced? ____ Yes ____X____ NO If so, how much advance notice given? ——

	Name	Affiliation	Telephone
Inspectors:	KAREN NESBIT	OEPA	(330) 963-1159
	BRENDA OSWALD	USEPA	(312) 353-4796
Facility Representative:	TOM CORDORA HEALTH SAFETY & ENV. MANAGER	PLASTI-KOTE	(330) 721-2521
	DUANE KENYON PRODUCTION & SAFETY SUPERVISOR	PLASTI-KOTE	(330) 721-2547
	TERRY SZESNY DIRECTOR OF OPERATIONS	PLASTI-KOTE	(330) 721-2519

Complete All Other Applicable Checklists

Generator Classification	Waste Management Activity
____ Conditionally Exempt SQG (CESQG)	____X____ Containers
____ Small Quantity Generator (SQG)	____ Tank(s)
____X____ Large Quantity Generator (LQG)	____X____ Land Disposal Requirements (LDR)
____ No Generation	____X____ Used Oil
	____X____ Universal Waste
	____ Other

CESQG: < 100 Kg. (approximately 25-30 gallons) of waste in a calendar month
SQG: Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month
LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or > 1 Kg. of acutely hazardous waste in a calendar month
NOTE: *To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds*

MPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

POLLUTION PREVENTION

Note to the Inspector: This checklist has been developed to help the division in gathering general information about the pollution prevention (P2) practices that the company may have initiated or attempted to initiate. The checklist is also used to:

- Facilitate P2 discussions;
- Identify barriers to P2;
- Define the P2 universe;
- Identify the need for future P2 initiatives;
- Identify partnership opportunities; and
- Link companies with better P2 resources.

As a prelude to completing this checklist the inspector should use the following list of questions as a way to initiate a dialogue concerning P2:

1. Have you tried to reduce the volume of waste (hazardous and nonhazardous) that you generate?

2. What is the largest waste stream that you generate?

3. How important would it be to you to eliminate that waste stream?

4. Does your company understand the reduced regulatory burden and cost saving benefits that eliminating or reducing a waste stream can have?

5. Could you use better housekeeping practices to reduce the amount of waste that you generate?

If the company responds with one of the answers below, the appropriate box should be checked. If the company's response does not correspond to one of the options below, please record the answer in the space provided or in the remarks section.

1. Has the company undertaken any P2 activities to reduce the amount of hazardous waste generated? Yes X No___ N/A ___ RMK#___

   a. ***If so,*** what has the company done to minimize hazardous waste generation?

   - ☐ A change in the process resulting in less waste.
   - ☐ A change in the product resulting in less waste.
   - ☐ Use of fewer and less toxic hazardous raw materials.
   - ☐ Better operations/improved housekeeping.
   - ☐ On-site recycling/reuse of hazardous materials.
   - ☐ Sending waste off-site for recycling/reuse.
   - ☐ Other activities (specify): Cardboard, Cans, Paper

   b. ***If so,*** what hazardous wastes have been addressed?

   - ☒ Solvents
   - ☒ Paint related wastes

- ☒ Industrial process wastes (sludges, slags, contaminated waste waters, etc)
- ☒ Contaminated oils/hydraulic fluids
- ☐ Off-spec chemicals
- ☒ Fluorescent light bulbs
- ☒ Used batteries
- ☒ Shop rags laundering
- ☐ Other (specify): _____

c. ***If not,*** why hasn't the company considered P2?

- ☐ The company just never thought about it
- ☐ Lack of information about practical alternatives
- ☐ Lack of capital to make process changes
- ☐ Lack of internal management support
- ☐ The company does not generate enough hazardous waste to consider P2
- ☐ Other reason given (specify): _____

2. Does the company plan to do P2 activities in the future? Yes X No ___ N/A ___ RMK#___

3. Would the company be interested in receiving additional information from Ohio EPA about P2? Yes X No___ N/A ___RMK#___

4. Did you give the company information about P2 during the inspection? Yes ___No X N/A ___RMK#___

5. Would the company like a P2 assessment? Yes___ No X N/A ___RMK#___

If the company would like a P2 assessment done at their facility, the inspector must give the company representative a copy of the Pollution Prevention Assessments for Hazardous Waste Generators document and discuss it with them.

6. If the company does not want a P2 assessment, why not? Will accept an assessment, but will discuss

REMARKS

LARGE QUANTITY GENERATOR REQUIREMENTS

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] — Yes X No ❑ N/A ___ RMK#___

2. Has the generator obtained an identification number? [3745-52-12] — Yes X No ❑ N/A ___ RMK#___

3. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41] — Yes X No ❑ N/A ___ RMK#___

WASTE IMPORT/EXPORT REQUIREMENTS

4. Does the generator import or export hazardous waste? If so: — Yes___ No X N/A ___ RMK#___

   a. Has the generator notified U.S. EPA of export/import activity? [3745-52-53] — Yes ___ No ❑ N/A ___ RMK#___

   b. Has the generator complied with special manifest requirements? [3745-52-54] — Yes ___ No ❑ N/A ___ RMK#___

   c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] — Yes ___ No ❑ N/A ___ RMK#___

   d. Has an annual report been submitted to U.S. EPA? [3745-52-56] — Yes ___ No ❑ N/A ___ RMK#___

   e. Are export related documents being maintained on-site? [3745-52-57] — Yes ___ No ❑ N/A ___ RMK#___

GENERATOR CLOSURE REQUIREMENTS

5. Has the generator closed any <90-day accumulation unit(s) since the date of the last inspection? If so: — Yes___ No X N/A ___ RMK#___

   a. Describe the unit(s) which the generator has closed.

   b. Does closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] — Yes ___ No ❑ N/A X RMK#___

c. Please provide a description of the documentation provided by the generator to demonstrate that closure was completed in accordance with the closure performance standards.

NOTE: ***If the generator has closed a <90-day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]***

REMARKS

MANIFEST REQUIREMENTS

You must start this part of the inspection by telling the company representative about the certification statement on the hazardous waste manifest using the following question and statement:

Are you aware of what the statement that you sign on the manifest says? Yes X No___

If the answer is no, show them what the statement says using a signed manifest.

NOTE: ***While the statement is a certification that a P2 strategy is in place, signing the statement does not establish any legal obligations with which the company must comply. In other words, there is no violation of the hazardous waste rules if they sign the manifest and they don't have a program in place.***

1. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] — Yes X No ☐ N/A ___RMK#___

2. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] — Yes X No ☐ N/A ___RMK#___

NOTE: ***U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)]***

3. Does each manifest designate at least one permitted disposal facility? [3745-52-20(B)] — Yes X No ☐ N/A ___RMK#___

NOTE: ***The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]***.

4. Since the date of the last inspection, has the transporter been unable to deliver a shipment of hazardous waste to the designated facility? If so: — Yes___ No X N/A ___RMK#___

   a. Did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] — Yes ___ No ☐ N/A X RMK#___

5. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)(2)] — Yes X No ☐ N/A ___RMK#___

6. Has the generator received a return copy of each completed manifest within 35 days of being accepted by the transporter? If not: — Yes X No___ N/A ___RMK#___

   a. Did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)] — Yes ___ No ☐ N/A X RMK#___

b. If the manifest was not received within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]

Yes ___ No ☐ N/A ☒ RMK#___

Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]

Yes ☒ No ☐ N/A ___ RMK#___

REMARKS

PERSONNEL TRAINING

1. Does the generator keep records required by 3745-65-16(D) including:

   a. Job titles, as they relate to hazardous waste management, and the name of each employee filling each job? Yes X No ☐ N/A ___ RMK#___

   b. Job descriptions, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position? Yes X No ☐ N/A ___ RMK#___

   c. Type and amount of both introductory and continuing training to be given to each person filling a position? Yes X No ☐ N/A ___ RMK#___

   d. Documentation that personnel have completed the training or job experience required under 3745-65-16(A)(B) & (C)? Yes X No ☐ N/A ___ RMK#___

NOTE: ***If the facility's business practices precludes written job titles/descriptions, they should be able to identify, by name, all personnel who are involved with hazardous waste management, and the training/experience that they receive initially and annually. Item 9 on the next page can be used to document that all necessary employees have been trained.***

2. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including, but not limited to, contingency plan implementation) relevant to their positions? [3745-65-16(A)(2) Yes X No ☐ N/A ___ RMK#___

3. Does the personnel training program include instruction in the following areas to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with: [3745-65-16(A)(3)]

   a. Emergency procedures? Yes X No ☐ N/A ___ RMK#___

   b. Emergency equipment? Yes X No ☐ N/A ___ RMK#___

   c. Emergency systems? Yes X No ☐ N/A ___ RMK#___

4. Does emergency training described in 3(a), (b) and (c) above include, *where applicable*: [3745-65-16(A)(3)(a-f)

   a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment? Yes X No ☐ N/A ___ RMK#___

b. Key parameters for automatic waste feed cut-off systems? Yes ___ No ☐ N/A X RMK#___

c. Communication or alarm system? Yes X No ☐ N/A ___RMK#___

d. Response procedures for fire/explosions? Yes X No ☐ N/A ___RMK#___

e. Response to groundwater contamination incidents? Yes ___ No ☐ N/A ___RMK#___

f. Shutdown procedures? Yes X No ☐ N/A ___RMK#___

5. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes X No ☐ N/A ___RMK#___

6. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes X No ☐ N/A ___RMK#___

7. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes X No ☐ N/A ___RMK#___

8. Are training records for current personnel kept until closure of the facility? [3745-65-16(E)] Yes X No ☐ N/A ___RMK#___

9. Are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes X No ☐ N/A ___RMK#___

10. ***Optional***: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifests, etc.

Job Performed	**Name of Employee**	**Date(s)Trained**

REMARKS

CONTINGENCY PLAN

1. Does the generator have a contingency plan which describes the following: [3745-65-52(A) through (F)]

   a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? Yes ☒ No ☐ N/A ___ RMK#___

   b. Arrangements/agreements with emergency authorities? [3745-65-37] Yes ☒ No ☐ N/A ___ RMK#___

   c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? Yes ☒ No ☐ N/A ___ RMK#___

   d. A list of all emergency equipment, including: location, physical description and brief outline of capabilities? Yes ☒ No ☐ N/A ___ RMK#___

   e. An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary? Yes ☒ No ☐ N/A ___ RMK#___

NOTE: ***If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]***

2. Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Yes ☒ No ☐ N/A ___ RMK#___

3. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)(B)] Yes ☒ No ☐ N/A ___ RMK#___

4. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, failure to the plan or as required by the Director? [3745-65-54] Yes ☒ No ☐ N/A ___ RMK#___
   WILL NEED TO UPDATE AGAIN TO INCORPORATE 2 NEW 90 DAY AREAS

EMERGENCY COORDINATOR

5. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes ☒ No ☐ N/A ___ RMK#___

NOTE: ***The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan***

6. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes___ No_X_N/A ___RMK#___

   a. Was the contingency plan implemented? [3745-65-51(B)] Yes ___ No ❑ N/A _X_RMK#___

   b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes ___ No ❑ N/A _X_RMK#___

   c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes ___ No ❑ N/A _X_RMK#___

NOTE: ***OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.***

REMARKS

PREPAREDNESS AND PREVENTION [3745-52-34(A)(4)]

1. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] — Yes X No ☐ N/A ___ RMK#___

2. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: [3745-65-32(A)(B)(C)(D)]

   a. Internal alarm system? — Yes X No ☐ N/A ___ RMK#___

   b. Emergency communication device? — Yes X No ☐ N/A ___ RMK#___

   c. Portable fire control, spill control and decon equipment? — Yes X No ☐ N/A ___ RMK#___

   d. Water of adequate volume/pressure? — Yes X No ☐ N/A ___ RMK#___

3. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] — Yes X No ☐ N/A ___ RMK#___

4. Are emergency equipment tests (inspections) recorded in a log or summary: [3745-65-33] — Yes X No ☐ N/A ___ RMK#___

5. Do personnel have immediate access to a communication device when handling hazardous waste (*unless the device is not required under 3745-65-32)*? [3745-65-34] — Yes X No ☐ N/A ___ RMK#___

6. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] — Yes X No ☐ N/A ___ RMK#___

7. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] — Yes X No ☐ N/A ___ RMK#___

   a. Where authorities have declined to enter into arrangements/agreements, has the generator documented such a refusal? [3745-65-37(B)] — Yes ___ No ☐ N/A X RMK#___

REMARKS

GENERATOR ACCUMULATION

1. Has the generator accumulated hazardous wastes on-site in excess of 90 days without a permit or an extension from the director? [3745-52-34; ORC §3734.02(E)(F)] — Yes ☐ No ☒ N/A ___ RMK#___

SATELLITE ACCUMULATION AREA REQUIREMENTS [3745-52-34(C)(1)]

2. Does the generator ensure that satellite accumulation area(s):

   a. Are at or near a point of generation? — Yes ☒ No ☐ N/A ___ RMK#___

   b. Are under the control of the operator of the process generating the waste? — Yes ☒ No ☐ N/A ___ RMK#___

   c. Do not exceed a total of 55 gallons of hazardous waste? — Yes ___ No ☒ N/A ___ RMK#___

   d Do not exceed one quart of acutely hazardous waste at any one time? — Yes ___ No ☐ N/A ☒ RMK#___

   e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? — Yes ☒ No ☐ N/A ___ RMK#___

NOTE: ***The 55 gallon limit applies to the area itself, and not to each individual waste stream accumulated in the area. The inspector should refer to Ohio EPA's November 1994 Guidance on the Location of Satellite Accumulation Areas.***

3. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in either 2(c) or 2(d)? If so: — Yes ☒ No ___ N/A ___ RMK#___

   a. Did the generator comply with 3745-52-34(A) or other applicable generator requirements within three days? — Yes ___ No ☒ N/A ___ RMK#___

   b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? — Yes ___ No ☒ N/A ___ RMK#___

USE AND MANAGEMENT OF CONTAINERS

4. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] — Yes ☒ No ☐ N/A ___ RMK#___

5. Is the accumulation date on each container? [3745-52-34(A)(2)] — Yes X No ☐ N/A ___ RMK#___

6. Are hazardous wastes stored in containers which are:

   a. Closed (except when adding/removing wastes)? [3745-66-73(A)] — Yes X No ☐ N/A ___ RMK#___

   b. In good condition? [3745-66-71] — Yes X No ☐ N/A ___ RMK#___

   c. Compatible with wastes stored in them? [3745-66-72] — Yes X No ☐ N/A ___ RMK#___

   d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] — Yes X No ☐ N/A ___ RMK#___

7. Is the container accumulation area(s) inspected weekly? [3745-66-74] (*Note location in general information section of checklist)* — Yes X No ☐ N/A ___ RMK#___

   a. Are inspections recorded in a log or summary? [3745-66-74] — Yes X No ☐ N/A ___ RMK#___

8. For ignitable and/or reactive hazardous waste(s):

   a. Are containers located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] — Yes X No ☐ N/A ___ RMK#___

   b. Are containers stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] — Yes X No X N/A ___ RMK#___

PRE-TRANSPORT REQUIREMENTS

9. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, -52-31 and -52-32(A)] — Yes X No ☐ N/A ___ RMK#___

10. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] — Yes X No ☐ N/A ___ RMK#___

11. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] — Yes X No ☐ N/A ___ RMK#___

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REMARKS

TANK SYSTEM REQUIREMENTS (OAC 3745-66-91 TO 3745-66-991)

(Please refer to the rules before or while completing this checklist.)

NOTE: ***New Tank System - Installation commencing after July 14, 1986.***
Existing Tank System - Installation or operation commencing on/before July 14, 1986.

1. **For an existing or new tank system(s)** has secondary containment been provided? [3745-66-93(A)(1) to (A)(5)] Yes___ No___ N/A X RMK#___

NOTES:

A. Secondary containment must be provided for all new tank systems or components, prior to their being put into service. [3745-66-93(A)(1)]

*B. For an existing tank system(s) of **known and documentable age** secondary containment is required to be provided within two years after January 12, 1987, or when the tank system has reached 15 years of age, whichever came later. [3745-66-93(A)(3)]*

*C. Secondary containment is required for all existing tanks for which the **age cannot be documented**. The tanks were required to have secondary containment within eight years of January 12, 1987 or when the facility turned 15 years of age, whichever came later. [3745-66-93(A)4)]*

D. Tank systems that store/treat materials that become hazardous waste after January 12, 1987, must have secondary containment required within the time intervals in OAC 3745-66-93(A)(1) to (A)(4). The date the material became a hazardous waste must be used in place of January 12, 1987. [3745-66-93(A)(5)]

E. If the tank system has no secondary containment, or a variance from secondary containment requirements has been granted, skip to the middle of page 6 of this Tank Systems Checklist.

2. Is the secondary containment one of the following:

a. An **External Liner** [3745-66-93(E)(1)(a) - (1)(f)] If so, Yes___ No___ N/A ___RMK#____

i. Is liner designed or operated to contain 100% of the capacity of the largest tank? Yes ___ No ❑ N/A ___RMK#___

ii. Is liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? Yes ___ No ❑ N/A ___RMK#___

iii. Is liner free of cracks and gaps? Yes ___ No ❑ N/A ___RMK#___

iv. Does liner completely surround the tank and cover all earth likely to be contacted by waste during a release? Yes ___ No ❑ N/A ___RMK#___

v. Are chemically resistant water stops in place at all joints? (*concrete liners only*) Yes ___ No ❑ N/A ___RMK#___

vi. Is there a compatible interior coating or lining to prevent migration of waste into the concrete? *(concrete liners only)* — Yes ___ No ❑ N/A ___RMK#___

b. **Vault System?** [3745-66-93(E)(2)(a) - (2)(f)] If so, — Yes___ No___ N/A ___RMK#___

i. Is vault system designed to contain 100% of the capacity in the largest tank? — Yes ___ No ❑ N/A ___RMK#___

ii. Is liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? — Yes ___ No ❑ N/A ___RMK#___

iii. Are chemically resistant water stops in place at all joints? — Yes ___ No ❑ N/A ___RMK#___

iv. Is there a compatible interior coating to prevent migration into the concrete? — Yes ___ No ❑ N/A ___RMK#___

v. For **ignitable or reactive waste**: Is the vault system provided with means to prevent against the formation or ignition of vapors? — Yes ___ No ❑ N/A ___RMK#___

vi Is vault system provided with an exterior moisture barrier? — Yes ___ No ❑ N/A ___RMK#___

c. **Double-Walled Tank?** [3745-66-93(E)(3)(a) - (3)(c)] If so, — Yes___ No___ N/A ___RMK#___

i. Is double-walled tank designed as an integral structure to contain any release from the inner tank? — Yes ___ No ❑ N/A ___RMK#___

ii. **If metal**, are the primary tank interior and outer shell exterior surfaces protected from corrosion? — Yes ___ No ❑ N/A ___RMK#___

iii. Is double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time? — Yes ___ No ❑ N/A ___RMK#___

4. Is the secondary containment system for the tank(s) an equivalent device as described in 3745-66-93(D)(4) which has been approved by the director? [3745-66-93(D)(E)] — Yes___ No___ N/A ___RMK#___

SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION (OAC 3745-66-93(B)(C))

5. Has each secondary containment system been designed, installed and operated to prevent any migration of wastes or liquid to the soil, ground water, or surface water and is it capable of detecting and collecting releases and accumulated liquids? [3745-66-93(B)] — Yes ___ No ❑ N/A ___RMK#___

6. Does the secondary containment system meet the following minimum requirements of 3745-66-93(C):

   a. Constructed or lined with compatible materials of sufficient strength to prevent failure? — Yes ___ No ❑ N/A ___RMK#___

   b. Placed on a foundation or base capable of providing support? — Yes ___ No ❑ N/A ___RMK#___

   c. Provided with a leak detection system designed/operated to detect failure to primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time? — Yes ___ No ❑ N/A ___RMK#___

   d. Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation? — Yes ___ No ❑ N/A ___RMK#___

   e. Any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner? — Yes ___ No ❑ N/A ___RMK#___

ANCILLARY EQUIPMENT REQUIREMENTS (OAC 3745-66-93(F))

7. Is ancillary equipment provided with secondary containment (such as double-walled piping, jacketing or a trench)? ***If not***, is the ancillary equipment: — Yes___ No___ N/A ___RMK#___

   a. Inspected daily? **AND**; — Yes ___ No ❑ N/A ___RMK#___

   b. Is ancillary equipment one of the following:

      i. Above ground piping (exclusive of flanges, joints, valves and connections)? — Yes ___ No ❑ N/A ___RMK#___

      ii. Welded flanges, welded joints and/or welded connections? — Yes ___ No ❑ N/A ___RMK#___

      iii. Sealless or magnetic coupling pumps and/or sealless valves? — Yes ___ No ❑ N/A ___RMK#___

iv. Pressurized above ground piping systems with automatic shut-off devices (e.g., excess flow check valves, flow metering shutdown, and/or loss of pressure-actuated shut-off devices)? Yes ___ No ❑ N/A ___RMK#___

REMARKS

NEW TANK SYSTEM REQUIREMENTS (OAC 3745-66-92)

1. Is there a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)? [3745-66-92(A)] Yes ___ No ❑ N/A ___RMK#___

2. Does the written assessment include the following: [OAC 3745-66-92(A)]

   a. Certification by an independent, registered, professional engineer? Yes ___ No ❑ N/A ___RMK#___

   b. Consideration of the design standards of the system? Yes ___ No ❑ N/A ___RMK#___

   c. Consideration of the hazardous characteristics of the waste(s)? Yes ___ No ❑ N/A ___RMK#___

   d. An evaluation by a corrosion expert (*if the external system/components are metal)*? Yes ___ No ❑ N/A ___RMK#___

   e. A determination of design and operational measures that will be needed to protect the tank system from potential damage *(for underground tank components)*? Yes ___ No ❑ N/A ___RMK#___

   f. Design considerations to ensure that the tank foundations will maintain the load of a full tank? Yes ___ No ❑ N/A ___RMK#___

   g. Design considerations for anchoring the unit to prevent floatation *(for tanks situated in a seismic fault zone or saturated zone)*? Yes ___ No ❑ N/A ___RMK#___

   h. Design considerations to ensure that the tank system will withstand the effects of frost heave *(for underground tank systems)*? Yes ___ No ❑ N/A ___RMK#___

3. Are there written statements by those person who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed? [3745-66-92(G)] Yes ___ No ❑ N/A ___RMK#___

Do the written statements address all of the following:

a. Inspection for damage and/or inadequate construction and installation was conducted? [3745-66-92(B)] Yes ___ No ❑ N/A ___RMK#___

b. Statement that deficiencies were corrected before the tank system was covered or put into use? [3745-66-92(B)] Yes ___ No ❑ N/A ___RMK#___

c. Proper backfilling? [3745-66-92(C)] Yes ___ No ❑ N/A ___RMK#___

d. Tightness test; if the tank was found not to be tight, does the statement indicate that proper repairs were made? [3745-66-92(D)] Yes ___ No ❑ N/A ___RMK#___

e. Proper support and protection of ancillary equipment? [3745-66-92(E)] Yes ___ No ❑ N/A ___RMK#___

f. Supervision of the installation of field fabricated corrosion protection? [3745-66-92(F)] Yes ___ No ❑ N/A ___RMK#___

TANK SYSTEMS WITHOUT SECONDARY CONTAINMENT (OAC 3745-66-91)

1. For existing tank system, without secondary containment: Is there a written assessment on file which includes the following considerations: [3745-66-91(A)(B)] Yes ___ No ❑ N/A ___RMK#___

a. Design standards? [3745-66-91(B)(1)] Yes ___ No ❑ N/A ___RMK#___

b. The characteristics of hazardous waste(s) that have been or will be handled? [3745-66-91(B)(2)] Yes ___ No ❑ N/A ___RMK#___

c. Corrosion protection measures? [3745-66-91(B)(3)] Yes ___ No ❑ N/A ___RMK#___

d. The age of the tank system has been estimated or documented? [3745-66-91(B)(4)] Yes ___ No ❑ N/A ___RMK#___

e. A leak test has been conducted? *(For non-enterable underground tanks)* [3745-66-91(B)(5)(a)] Yes ___ No ❑ N/A ___RMK#___

f. A leak test or an internal inspection by qualified P.E. has been conducted? *(For <u>other than</u> non-enterable underground tanks and for ancillary equipment)* [3745-66-91(B)(5)(b)] Yes ___ No ❑ N/A ___RMK#___

g. Is assessment certified by an independent, registered P.E.? [3745-66-91(A)] Yes ___ No ❑ N/A ___RMK#___

2. Have the tests specified in 1e and 1f been conducted annually on the tanks and ancillary equipment until secondary containment is provided? [3745-66-93(I)] ***If so,*** Yes ___ No ❑ N/A ___RMK#___

a. Have tests been certified by an independent, registered P.E.? Yes ___ No ❑ N/A ___RMK#___

3. For tanks without secondary containment used to store or treat wastes which become hazardous wastes after July 14, 1986, has the assessment been completed within 12 months of the date the waste became a hazardous waste? [3745-66-91(C)] Yes ___ No ❑ N/A ___RMK#___

TANK SYSTEM - GENERAL OPERATING REQUIREMENTS (OAC 3745-66-94)

1. Does the o/o follow the general operating requirements below:

a. Does the o/o prevent placement of hazardous waste or treatment reagents in tank or secondary containment if such placement can cause the system to leak, rupture, corrode, or otherwise fail? [3745-66-94(A)] Yes ___ No ❑ N/A ___RMK#___

b. Does the o/o use appropriate controls to prevent spills or overflows from the system (e.g., check valves, dry disconnect couplings, high level alarms, etc.)? [3745-66-94(B)] Yes ___ No ❑ N/A ___RMK#___

c. If a leak or spill has occurred in the tank system, has the o/o complied with 3745-66-96? [3745-66-94(C)] Yes ___ No ❑ N/A ___RMK#___

TANK SYSTEM - INSPECTION REQUIREMENTS (OAC 3745-66-95)

1. Has the o/o documented the inspections required in 3745-66-95, in the operating record, including inspection of the following:

a. Spill control equipment (daily)? [3745-66-95(A)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Above ground portion of tank (daily)? [3745-66-95(A)(2)] Yes ___ No ❑ N/A ___RMK#___

c. Data from leak detection equipment (daily)? [3745-66-95(A)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste (daily)? [3745-66-95(A)(4)] Yes ___ No ❑ N/A ___RMK#___

e. Where applicable, the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter? [3745-66-95(B)(1)] Yes ___ No ❑ N/A ___RMK#___

f. Where applicable, all sources of impressed current at least bi-monthly? [3745-66-95(B)(2)] Yes ___ No ❑ N/A ___RMK#___

TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES (OAC 3745-66-98 AND 3745-66-99)

1. For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with **one of the following:** [3745-66-98(A)]

   a. Is the waste treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o has conducted such activities in compliance with 3745-65-17(B)? [3745-66-98(A)(1)]; **OR** Yes___ No___ N/A ___RMK#____

   b. Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction? [3745-66-98(A)(2)]; **OR** Yes___ No___ N/A ___RMK#____

   c. The tank is used solely for emergencies? [3745-66-98(A)(3)] Yes___ No___ N/A ___RMK#____

2. If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA Flammable and Combustible Code (1996)? [3745-66-98(B)] Yes ___ No ❑ N/A ___RMK#___

3. Has the o/o placed incompatible wastes or materials into the same tank system, or into a tank system that has not been decontaminated and which previously held an incompatible waste or material? [3745-66-99] Yes___ No___ N/A ___RMK#____

a. ***If so,*** have the requirements of 3745-65-17(B) been met? Yes ___ No ❑ N/A ___RMK#___

TANK SYSTEM - WASTE ANALYSIS REQUIREMENTS (OAC 3745-66-991)

1. In addition to conducting the waste analysis required by 3745-65-13, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following: [3745-66-991] Yes___ No___ N/A ___RMK#____

   a. Conducted waste analysis and trial treatment storage tests? [3745-66-991]; OR Yes___ No___ N/A ___RMK#____

   b. Obtained written documentation on similar waste under similar operating conditions to show that the proposed storage/treatment will meet the requirements of OAC 3745-66-94? [3745-66-991(B)] Yes___ No___ N/A ___RMK#____

TANK SYSTEMS FOUND TO BE LEAKING OR UNFIT FOR USE (OAC 3745-66-96)

1. Has there been a leak or spill from any tank system or has any tank system been found unfit for use? ***If so***, did the o/o: Yes___ No___ N/A ___RMK#____

   a. Immediately cease flow of material into tank and investigate the cause of the release? [3745-66-96(A)] Yes ___ No ❑ N/A ___RMK#___

   b. Remove waste from tank system to prevent further release within 24 hours of detection or earliest practicable time? [3745-66-96(B)(1)] Yes ___ No ❑ N/A ___RMK#___

   c. Remove all material released into secondary containment system within 24 hours or as timely as possible to prevent harm to human health and the environment? [3745-66-96(B)(2)] Yes ___ No ❑ N/A ___RMK#___

   d. Immediately conduct a visual inspection of the release? [3745-66-96(C)] Yes ___ No ❑ N/A ___RMK#___

   e. Prevent further migration of the leak or spill to soils or surface waters? [3745-66-96(C)(1)] Yes ___ No ❑ N/A ___RMK#___

   f. Properly dispose of any visibly contaminated soil or surface water? [3745-66-96(C)(2)] Yes ___ No ❑ N/A ___RMK#___

g. Report the release to the director within 24 hours unless it was less than one pound and was cleaned up immediately? [3745-66-96(D)(1)(2)] Yes ___ No ❑ N/A ___RMK#___

h. Submit a written report of the incident to the director within 30 days of the release? [3745-66-96(D)(3)] Yes ___ No ❑ N/A ___RMK#___

i. Remediate the spill and repair the unit prior to returning it to service? [3745-66-96(E)] Yes ___ No ❑ N/A ___RMK#___

j. For a release from a tank system without secondary containment, did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the unit prior to putting it back into service? [3745-66-96(E)(4)] Yes ___ No ❑ N/A ___RMK#___

NOTE: *The requirements noted 1.j. do not apply if the release was from an above ground component of the tank which can be inspected visually after being put back into service.*

2. In the event that the repairs to the tank system were major (replacement of liner, repair of ruptured primary or secondary containment structure), did the o/o obtain a certification from an independent, registered P.E. attesting that the repaired unit is capable of handling hazardous waste? [3745-66-96(F)] Yes ___ No ❑ N/A ___RMK#___

a. Was a copy of the certification submitted to the director within seven days after returning the system to use? [3745-66-96(F)] Yes ___ No ❑ N/A ___RMK#___

3. If the o/o was unable to repair and return the unit to service as described in 1.a through 1.e, was the tank system closed in accordance with 3745-66-97? [3745-66-96(E)(1)] Yes ___ No ❑ N/A ___RMK#___

4. Does the o/o have a tank system **with a variance from secondary containment** from which a release has occurred but <u>has not</u> migrated beyond the zone of engineering control? **If so,** Yes___ No___ N/A ___RMK#___

a. Has the o/o complied with 3745-66-96(A) through (F) and decontaminated soils? [3745-66-93(G)(3)] Yes ___ No ❑ N/A ___RMK#___

b. If soils cannot be contaminated/removed, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(3)] Yes ___ No ❑ N/A ___RMK#___

5. Does the o/o have a tank system **with a variance from secondary containment** from which a release occurred and has migrated from the zone of engineering control? **If so,** Yes___ No___ N/A ___RMK#____

a. Has the o/o complied with 3745-66-96(A) through (D), prevented migration, and decontaminated soil? [3745-66-93(G)(4)] Yes ___ No ❑ N/A ___RMK#___

b. If soils cannot be decontaminated/removed, or if the groundwater has been contaminated, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(4)] Yes ___ No ❑ N/A ___RMK#___

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REMARKS

OhioEPA
State of Ohio Environmental Protection Agency
Northeast District Office

) E. Aurora Road
ısburg, Ohio 44087-1969

TELE (330) 425-9171 FAX (330) 487-0769

Bob Taft, Governor
Christopher Jones, Director

May 11, 2004

RE: PLASTI-KOTE CO., INC.
OHD 091 620 369
MEDINA COUNTY
CEI/NOV

Mr. Tom Corpora
Plasti-Kote Co., Inc.
1000 Lake Road
Medina, Ohio 44256

Dear Mr. Corpora:

On April 22, 2004, Ohio EPA conducted a compliance evaluation inspection of Plasti-Kote Co., Inc., Medina facility to determine Plasti-Kote's compliance with Ohio's hazardous waste laws and regulations as found under the Ohio Revised Code and the Ohio Administrative Code ("ORC" and "OAC" respectively). Plasti-Kote was represented by Terry Szesny and you. The Ohio EPA was represented by me. In addition, US EPA, represented by Brenda Oswald of Region V, conducted a hazardous waste compliance inspection for the requirements found in 40 CFR 265 Subpart AA, BB and CC of the Federal hazardous waste regulations. Please note, any violations found by USEPA will be addressed under separate cover. The Ohio EPA's compliance inspection included an inspection of the facility operations and a review of written documentation. Based on this inspection, Ohio EPA has determined that Plasti-Kote has violated at least the following state hazardous waste regulations:

Violations:

1.) ***Satellite Accumulation Area Requirements, OAC 3745-52-34(C)(1):*** A generator may accumulate as much as 55 gallons of hazardous waste in a satellite area provided the containers are near the point of generation where the wastes are initially accumulated and under control of the operator of the process generating the waste.

Waste is being accumulated in amounts greater than 55 gallons in the following areas:

a. In the area near the cap spray booth for the Flexstone were two drums, both nearly full, therefore, the amount of waste in the area exceeded 55 gallons.

b. The tote for aerosol cans had greater than 55 gallons.

c. Near the waste pigment drum of the APC system in Mix Room 2.

Plasti-Kote agreed to convert these satellite areas to less than 90 day accumulation areas.

To document compliance, the facility shall submit three weeks of completed weekly inspections.

2.) ***Labeling Requirements for Hazardous Waste Containers, OAC 3745-52-34(A)(2):*** Containers accumulating hazardous waste must be clearly marked with the date accumulation began.

The accumulation date was not on the "solid waste" paint drum.

Since this drum will be shipped off site prior to the letter being sent, Ohio EPA requests that documentation be submitted to demonstrate all employees responsible for putting accumulation dates on drums have been trained/notified of the regulatory requirements.

3.) ***Used Oil Storage Requirements for Generators, OAC 3745-279-22:*** All containers of used oil shall be clearly labeled or marked "Used Oil."

The used oil on site was labeled "waste oil."

Plasti-Kote shall submit documentation demonstrating that the containers are now labeled "used oil."

4.) ***Accumulation Time for Universal Waste, OAC 3745-273-15(C):*** The length of time universal waste is stored must be documented in some manner.

Plasti-kote did not have a mechanism to document that the universal waste on site was not being accumulated longer than one year.

Plasti-Kote shall submit documentation demonstrating that the amount of time the universal waste is on site can be determined.

Ohio EPA also had the following concerns:

5.) The 'new' less than 90 day accumulation areas noted in violation 1 need to have spill control equipment.

Plasti-Kote shall submit photographs demonstrating that the spill control is in place. In addition, the contingency plan should be updated to reflect these changes. Plasti-Kote shall submit the revised pages and include a map that has the locations of all of the accumulation areas.

6.) It was noted that some of the waste labels include the waste code F002. You stated that this was probably a typo created when Plasti-Kote made their own labels. Plasti-Kote should remove the F002 waste code from all future labels.

7.) Currently, Plasti-Kote is not managing their fluorescent bulbs in a manner which would minimize breakage. It is recommended that containers are procured for the spent bulbs and that you start managing these bulbs as universal waste, *e.g.* label as universal waste, accumulated on site less than 1 year, *etc.*

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment and improve your public image by implementing pollution prevention programs.

For more information about pollution prevention, including fact sheets or U.S. EPA's "Facility Pollution Prevention Guide" (EPA/600/R-92/088), please contact the Ohio EPA Pollution Prevention Section at (614) 644-3469.

Failure to list specific deficiencies and/or violations in this communication does not relieve Aerosol from the responsibility of complying with all applicable laws, rules and regulations.

Be advised that the Ohio EPA reserves the right pursuant to ORC Chapters 3734 and 6111 and any other applicable state and federal laws or regulations, to require further site investigation and remediation to address any unpermitted releases of hazardous waste, hazardous substances, industrial wastes, pollutants, and/or contaminants into the environment.

Further be advised that any instances of non-compliance can continue as subjects of pending or future enforcement actions.

Please respond to this letter in writing by June 15, 2004, and provide all of the information requested above. Should you have any questions or require additional information, please contact Frank Popotnik, my supervisor, or me at (330) 963-1200.

Sincerely,

Karen L. Nesbit
Division of Hazardous Waste Management

KLN:cl
Enclosure

ec: Frank Popotnik, DHWM, NEDO

cc: Tammy McConnell, DHWM, CO (with enclosure)
Brenda Oswald, USEPA Region V